

## Privacy Policy

Taking a proactive approach in protecting consumer privacy has always been an important focus for GLOVALEX. We continuously seek ways to protect and assure appropriate use of information related to our clients and to promote policies within the industry that do the same.

## Privacy Principles

As a leader in helping clients manage consumer information, GLOVALEX has long understood the importance of fair information practices and consumer privacy. The growth of social networks and remote transactions means a company's ability to know its audience also involves honoring individual preferences regarding privacy. GLOVALEX helps clients improve relationships with consumers by eliminating and/or avoiding any improper information exchange on the platforms over the Internet.

GLOVALEX provides the critical services, products and technology that companies need to honor customer preferences and maintain good customer relationships. GLOVALEX and its associates worldwide pledge to conduct our business according to the following principles.

### Global Privacy Principles

GLOVALEX takes Japan Personal Information Protection Law, which is one of the most strict regulations about the privacy in the world, as the base of our global group policy.

In this Law, "personal information database" means the collection of information containing personal information, which –

1. is systematically structured so that specific personal information can be retrieved by computer, or,
2. except that described above, is considered by the Government decree to be systematically structured so that specific personal information can be retrieved.

For example, name, address, telephone number, e-mail address, birth day, UID (handy phone), membership ID etc. are all handled as personal information by GLOVALEX.

GOVALEX uses personal information in order to provide a good service to our each client as long as that personal information belongs to the client. We announce clearly the usage of the personal information before we collect them and will not use them over the extent of the pre-announcement.

GLOVALEX handles with personal information which we have collected under the most careful and strict control that prevents injurious access, data destruction and manipulation, information leakage etc. We keep a great effort to secure personal information in the measure of both IT security and manned operations. In case of working with the third party companies we control them bound by the contract and keep watching their operations. When any personal information of a user become no longer necessary due to resignation of the membership, for example, it shall be deleted after saving for a reasonable period.

When a user directly requests GLOVALEX to delete his or her personal information we will take steps to grant it according to the acceptance of service policy, which may accrue some charge depending on the service policy.

GLOVALEX observes any regulations, not only Japan Personal Information Protection Law, regarding privacy in each location.

GLOVALEX shall never provide any personal information to other parties excluding a case of orders by law.

GLOVALEX keeps the internal review regularly and enhances our policy and operations when necessary.

#### Contact

We open the contact window to receive any questions about the personal information issues.

[usa-info@glovaex.com](mailto:usa-info@glovaex.com)

\* This policy may be up dated without any notice.

September, 2014  
GLOVALEX America Inc.